

JUDGE RAKOFF

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

WEI QUAN JI,
a/k/a "Jimmy"

Defendant.

INDICTMENT

07 CRIM. 295

COUNTS ONE THROUGH FOUR

(Mail Fraud)

The Grand Jury charges:

1. From at least in or about June 2004, up to and including in or about February 2006, in the Southern District of New York and elsewhere, WEI QUAN JI, a/k/a "Jimmy," the defendant, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, unlawfully, willfully, and knowingly, and for the purpose of executing such scheme and artifice and attempting to do so, did cause to be delivered by mail according to the direction thereon, matters and things to be sent and delivered by the Postal Service, to wit, WEI QUAN JI a/k/a "Jimmy," while fraudulently holding himself out as an immigration attorney, engaged in an immigration fraud scheme whereby he, among other things, filed fraudulently-altered immigration documents with the United States Court of Appeals for the Second Circuit, and

thereby caused mailings from the Court of Appeals to be sent to Chinese aliens at a phony address provided by JI:

| Count | Mailing Date | Sender | Addressee |
|-------|--------------|------------------|--|
| 1 | 9/13/06 | Court of Appeals | Xue Jian Gao 32 East Broadway, Apt. 403 New York, NY 10002 |
| 2 | 9/15/06 | Court of Appeals | Sheng Chun Jiang 32 East Broadway, Apt. 403 New York, NY 10002 |
| 3 | 10/5/06 | Court of Appeals | Lin Liang 32 East Broadway, Apt. 403 New York, NY 10002 |
| 4 | 10/12/06 | Court of Appeals | Yu Fang Chen 32 East Broadway, Apt. 403 New York, NY 10002 |

(Title 18, United States Code, Section 1341.)

COUNT FIVE

(Immigration Fraud)

The Grand Jury charges:

2. From at least in or about June 2004, up to and including in or about February 2006, in the Southern District of New York and elsewhere, WEI QUAN JI, a/k/a "Jimmy," the defendant, unlawfully, willfully, and knowingly, did present applications, affidavits, and other documents required by the immigration laws and regulations prescribed thereunder, which contained false statements and which failed to contain a reasonable basis in law or fact, to wit, WEI QUAN JI, a/k/a "Jimmy," prepared and filed falsified affidavits and immigration documents with the United States Court of Appeals for the Second

Circuit on behalf of Chinese aliens.

(Title 18, United States Code, Section 1546.)

FORFEITURE ALLEGATION

3. As the result of committing the mail fraud and immigration fraud offenses in violation of Title 18, United States Code, Sections 1341 and 1546, alleged in Counts One through Five of this Indictment, WEI QUAN JI, a/k/a "Jimmy," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

Substitute Asset Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third person;
 - (3) has been placed beyond the jurisdiction of the Court;
 - (4) has been substantially diminished in value; or
 - (5) has been commingled with other property which cannot be subdivided without difficulty;
- it is the intent of the United States, pursuant to 18 U.S.C.

§ 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including but not limited to the following:

a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 65-43 110 Street, Queens, New York.

(Title 18, United States Code, Section 981 and
Title 28, United States Code, Section 2461.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v. -

**WEI QUAN JI,
a/k/a "Jimmy,"**

Defendant.

INDICTMENT

07 CR ____

(Title 18, United States Code, Sections 1341 and 1546).

Michael J. Garcia
United States Attorney.

A TRUE BILL

Jose Lamaschia-Pardo
Foreperson.

*April 12, 2007 (Ls)
Indictment filed. JMW issued.
Case assigned to Judge Ruff
FELIXMAR (SL)*